

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

| | | |
|--------------------------------|---|--|
| GREAT LAKES INSURANCE SE | X | |
| IN ITS OWN RIGHT AND/OR AS | : | |
| SUBROGEE OF PACIFIC GULF | : | |
| SHIPPING CO., | : | |
| | : | |
| | : | |
| Plaintiff, | : | |
| | : | |
| v. | : | |
| | : | |
| AMERICAN STEAMSHIP OWNERS | : | |
| MUTUAL PROTECTION AND | : | |
| INDEMNITY ASSOCIATION INC. | : | |
| A/K/A THE AMERICAN CLUB, | : | |
| SHIPOWNERS CLAIMS BUREAU INC., | : | |
| GEORGE GOURDOMICHALIS, AND | : | |
| EFSTATHIOS GOURDOMICHALIS, | : | |
| | : | |
| Defendants. | : | |
| | X | |

CIVIL ACTION NO. 1:19-CV-10656-RA

**NOTICE OF MOTION TO
DISMISS THE COMPLAINT**

PLEASE TAKE NOTICE that Defendants, GEORGE GOURDOMICHALIS AND EFSTATHIOS GOURDOMICHALIS, pursuant to their limited appearances and without waiver of any of their rights or defenses, will move this Court before the Honorable Ronnie Abrams, at the United States Courthouse located at 40 Foley Square, New York, New York, at a date and time to be set by the Court, for an Order, pursuant to Rules 9, 12, and 37 of the Federal Rules of Civil Procedure as well as the inherent power of the Court to fashion appropriate remedies for violation of a protective order, dismissing the Complaint in its entirety, awarding attorneys' fees in connection with this motion and granting such further and different relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that opposition papers are required to be served and filed in accordance with the Federal Rules of Civil Procedure and the Local Rules of the United States District Court for the Southern and Eastern Districts of New York.

Dated: New York, New York
January 17, 2020

Respectfully submitted,

BLANK ROME LLP

s/ William R. Bennett, III

William R. Bennett, III
Lauren B. Wilgus

1271 Avenue of the Americas
New York, New York 10020
Tel.: (212) 885-5000
WBennett@BlankRome.com
LWilgus@BlankRome.com

*Attorneys for Defendants
George Gourdomichalis and
Efsthios Gourdomichalis*